

# Declaration of Principles on Respecting Human Rights

Telefónica Deutschland



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# Our commitment to respecting human rights

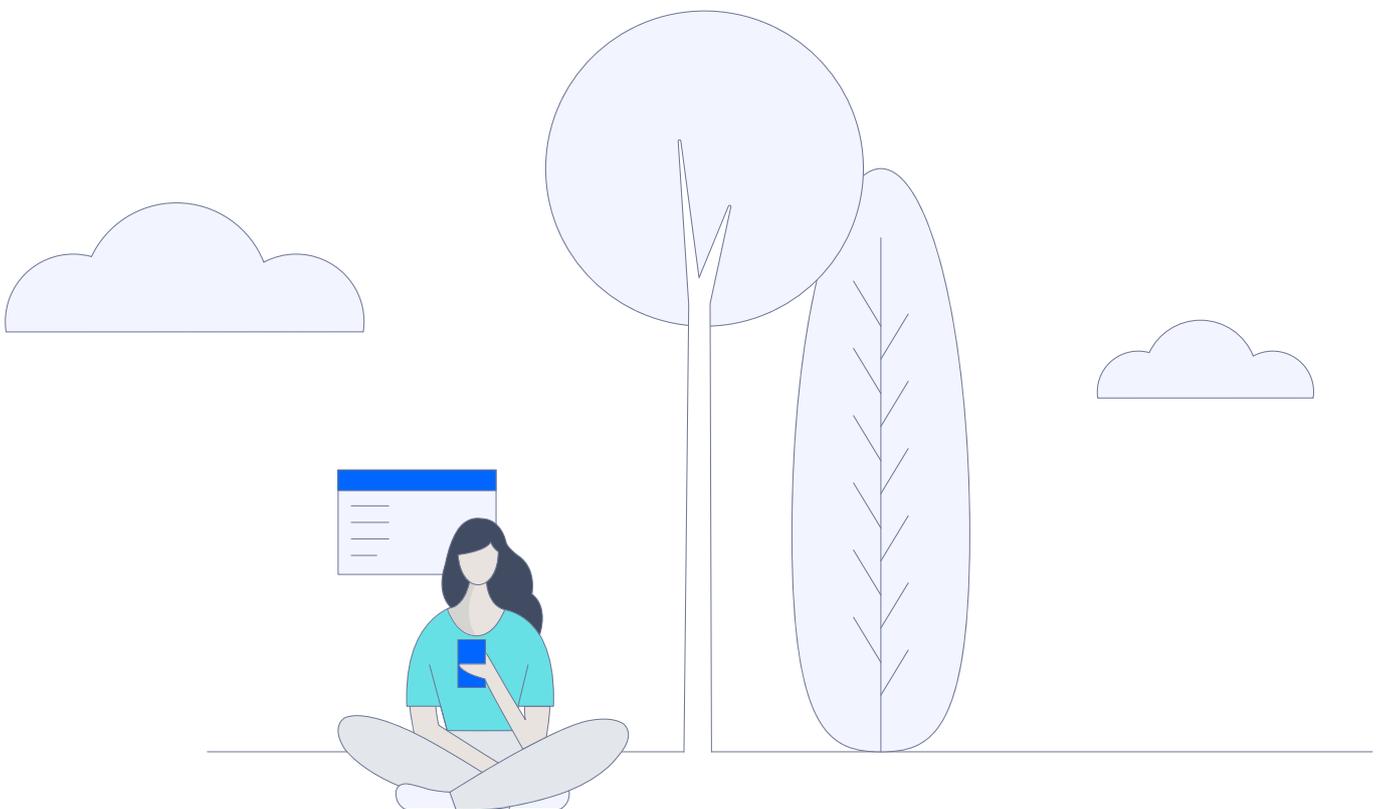
We democratise access to sustainable digitalisation to make day-to-day life better for everyone. We want to use digitalisation for the benefit of people and strengthen the connections between them. At the same time, in the interest of responsible corporate governance, we consider potential impacts that our business activities might have on people and the environment.

In doing so, we embed not only the legislative requirements such as the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), but also our own understanding of values. In this Declaration of Principles, we commit ourselves to respecting and protecting human rights and specify our corporate obligations. We apply existing laws, respect internationally recognised human rights and ensure that, within

the scope of our business activities, potential human rights and environment-related risks are avoided. Where we are unable to do so, we aim to identify risks as early as possible and remedy them responsibly.

The Declaration of Principles applies to all companies of Telefónica Deutschland Holding AG (Telefónica Deutschland). It is complemented by the [Human Rights Policy](#).

With this Declaration of Principles, Telefónica Deutschland commits itself to respecting and promoting human rights within our company, with regard to our customers, along our supply chains and towards customers and the wider society.



## Standards and frameworks

We are committed to the principles of the following internationally recognised human rights frameworks and standards:

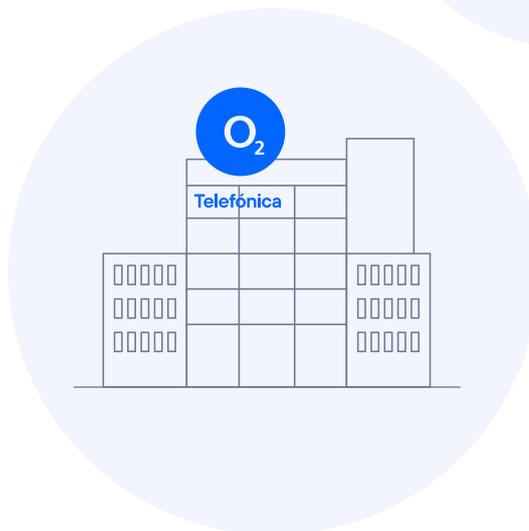
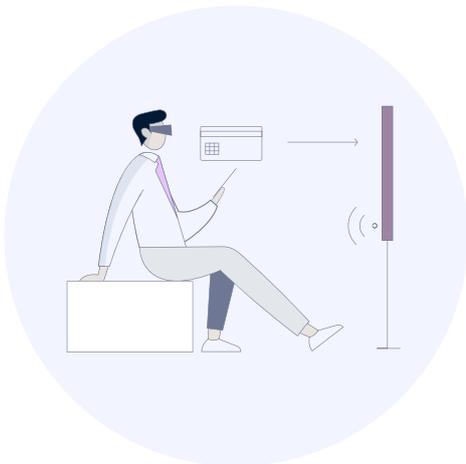
- The International Bill of Human Rights (which includes the United Nations Universal Declaration of Human Rights, the United Nations International Covenant on Civil and Political Rights, and the United Nations International Covenant on Economic, Social and Cultural Rights)
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Conventions and Recommendations of the International Labour Organization (ILO) for labour and social standards, in particular the ILO's core labour standards
- The International Labour Organization's Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration)
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- The Ten Principles of the United Nations Global Compact (UNGC)
- The Charter of Fundamental Rights of the European Union
- The United Nations Convention on the Rights of the Child

We further support the United Nations 2030 Agenda for Sustainable Development and aim to make a contribution to achieving the Sustainable Development Goals (SDGs).

## Our company guidelines and principles

The norms and values embedded in the aforementioned frameworks lay the foundations of our own policies and principles and set out our binding framework. In addition to this Declaration of Principles, the following guidelines are central:

- **Responsible Business Principles** ↗: our binding guidelines for our activities and decisions when dealing with third parties – both within and outside our company.
- **Human Rights Policy** ↗: our commitment to respecting and promoting human rights at our company's own sites and other places of business, in our supply chains, in customers' operations and society as a whole.
- **Supply Chain Sustainability Policy** ↗: our binding guideline for our business partners, suppliers and their sub-suppliers. It states our minimum requirements and forms the basis for a trusting and successful cooperation.



**Overview of other relevant guidelines:**

The most important guidelines and guiding principles for successful sustainability management



**Governance for responsible corporate management**

- Business Principles
- Management Declaration
- Declaration of Principles on Respecting Human Rights
- Human Rights Policy
- Corruption prevention guidelines
- Guidelines on handling conflicts of interest, invitations, gifts and incentives
- Whistle-blower Policy
- Policy Compliance Organisation
- Business continuity management guidelines
- Company guidelines on corporate responsibility
- Donation guidelines
- Risk Management Policy
- Guidelines for ethically responsible communication
- Social Media Guidelines
- Artificial Intelligence Principles
- Whistle-blower procedure for human rights and environment-related risks or violations



**Sustainable supply chain management**

- Supply Chain Sustainability Policy (incl. conflict minerals)
- Low-carbon procurement guidelines
- Purchasing guidelines
- General Conditions for the Supply of Goods & Services
- Supplier Management Instruction
- Rules for the procurement of services and handling service providers



**Work environment**

- Bonus arrangements in the remuneration of the Management Board and of the executives
- Diversity & Inclusion Policy
- Equality Policy
- Health policy
- Group standard occupational health and safety management
- Risk assessment guidelines
- Guidelines on occupational health care
- Guidelines for occupational health and safety officers
- Emergency organisation guidelines
- Fire safety regulation guidelines
- First aid guidelines



**Environmental and energy management**

- Environment and Energy Policy
- Group-wide commitment to achieving net zero emissions



**Data protection and freedom of expression**

- Group data protection standard incl. commitment and guidelines on handling data
- Data protection contract guidelines
- Data protection information obligation guidelines
- Procedural instructions for data protection controls
- Procedural instructions for data privacy incidents



**Information security**

- Information security policy
- Corporate Rule on Minimum Controls
- Confidentiality levels
- Guidelines on security incidents
- Guidelines on physical safety
- Cloud security policy

# Human rights and environment-related areas of action

Respecting human rights in our own business and within our supply chains is a key component of our human rights and environmental strategy. We are therefore committed to the following principles:

## Non-discrimination and promotion of diversity and equal opportunity

We do not tolerate any discrimination on the basis of gender, sexual orientation, gender identity, age, disability, ethnicity, skin colour, language, geographical origin, social background, beliefs, or religious or political views in dealing with employees, suppliers, business partners, customers or other stakeholder groups.

We also pursue a zero-tolerance approach in relation to violence and harassment in the workplace. This includes, for example, abuse in general, including physical or verbal abuse or the threat thereof, sexual harassment and all other forms of harassment or intimidation.

We promote diversity, equality and inclusion in our company through various programmes. The Diversity, Equity & Inclusion (DE&I) unit coordinates the relevant activities. Detailed information can be found in our [Diversity and Inclusion Policy](#) and in the [Equality Policy](#).

## Prohibition of forced labour and modern slavery

We do not tolerate any form of forced labour or modern slavery (zero tolerance). Any type of work or service must be voluntary and not performed under threat of punishment.

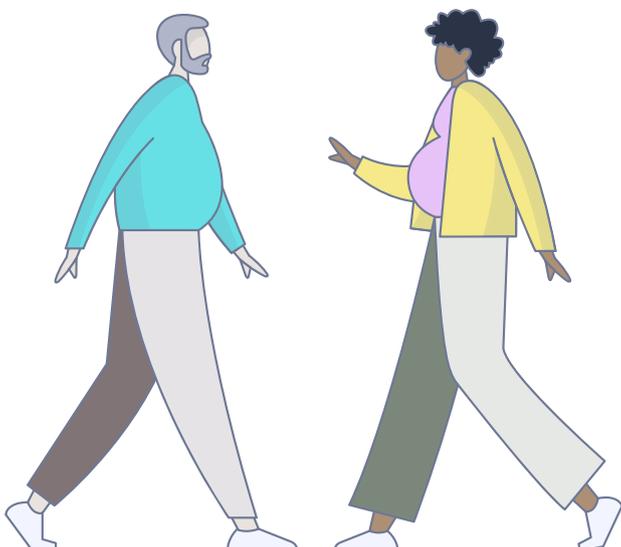
This includes imprisonment, the use of physical or psychological violence, the restriction of freedom (of movement), the withholding of wages, demanding recruitment fees or other payments, the confiscation of personal documents, abusive labour conditions or other forms of exploitation.

## Prohibition of child labour

We do not tolerate child labour within the meaning of ILO Convention Nos. 138 and 182 (zero tolerance). Children under the age of 15 may not pursue gainful employment. Children and adolescents aged between 15 and 18 who have access to the labour market in accordance with local legislation may not be exposed to work which could be detrimental to their physical or mental health, their safety or morals.

## Freedom of association and the right to collective bargaining

Workers may join employee representation bodies and have the right to engage in collective bargaining. Membership of trade unions or employee representation bodies has no disadvantages for workers, such as discrimination, intimidation or reprisal.



We collaborate with employee representatives constructively and on the basis of trust and appreciate the contribution they make to the well-being of our employees. We make sure that employee representation bodies are in a position to negotiate over issues dealing with employer–employee relations and we provide the parties concerned with the opportunity to hold discussions with entitled representatives of company management surrounding matters of mutual interest.

In our negotiations, we refrain from threatening to relocate operations nor to transfer workers with the aim of exerting influence on the negotiating process or as a way of hindering rights. We supply information to employee representatives swiftly when it is needed for negotiations related to working conditions, making it possible for the representatives to be presented with a true picture of the company’s working conditions. If operational changes are planned, we inform the representatives of the employees affected at an early stage to mitigate any potential negative impacts as far as possible. Through involving our employee representatives, we promote better working conditions and the fair treatment of staff.

We seek to facilitate and not impede access to parallel instruments of voluntary association and collective bargaining for the workers in our supply chains and, in particular, in countries with restricted rights of association.

## Right to safety and health in the workplace

We are committed to complying with the globally recognised standards for occupational health and safety as set out in the aforementioned Conventions and Recommendations of the ILO and in the International Bill of Human Rights of the United Nations and have implemented appropriate measures. They include occupational health and safety training, appropriate protective equipment and promoting an ergonomic workplace.

Further information on occupational health and safety can be found in our Health Policy (internal guidelines) and in the Group Occupational Health and Safety Management Standard (internal guidelines).

We expect from security staff that works for us to behave fairly towards third parties at all times and to contribute to workplace safety. We also communicate these minimum requirements to our suppliers and business partners in the [Supply Chain Sustainability Policy](#) ↗.

## Right to fair labour conditions

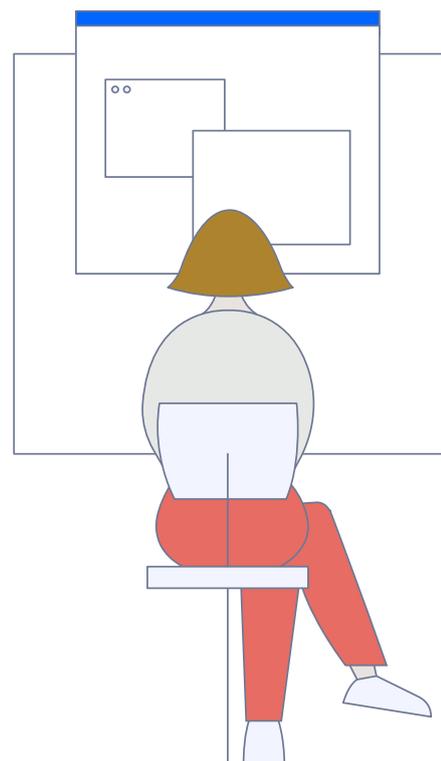
We are committed to creating fair and appropriate labour conditions and promoting well-being, interaction and development of employees.

This includes **appropriate remuneration** in line with at least national or local legislation. Employees receive information on payment of wages in a written and comprehensible form at the beginning of the employment relationship. Wage reductions as a form of disciplinary measure are prohibited.

We are committed to reducing and eliminating gender pay gaps for work of equal value and meet the requirements of the regulations regarding remuneration transparency (Transparency in Wage Structures Act, EntgTranspG). Our remuneration is competitive and is complemented by additional benefits.

We aspire to workers in the supply chain likewise being paid an appropriate and fair salary.

We observe the **working and rest times** of the ILO’s core labour standards and the applicable national regulations. Furthermore, the compatibility of work and private life is an important matter for Telefónica Deutschland. This encompasses rules and procedures regarding overtime, annual leave, sick days and parental leave. Overtime is remunerated accordingly or can be taken as time off in lieu. We also make these expectations of our suppliers and business partners.



## Right to data protection and privacy

We ensure the lawful processing of personal data to respect the fundamental rights and freedoms of people, in particular the right to informational self-determination.

Our aim is for customers, employees, suppliers, business partners and investors to retain sovereignty over their data. To this end, we protect third-party data in all products, processes and systems, and ensure that Telefónica Deutschland complies with data protection regulations. Our actions are straightforward and transparent, and we communicate with all the relevant interest groups about innovations at an early stage.

In addition to personal data, we ensure the protection of traffic and inventory data. Exceptions that allow traffic and inventory data to be shared with state authorities are subject to legal obligations.

Our customers have access to their personal data via self-service tools.

More information on the lawful processing and management of data can be found among other things in our Group Data Protection Standard (internal guidelines), the Data Protection and Information Obligation Guidelines (internal guidelines) and the Information Security Policy (internal guidelines).

## Right to freedom of expression and freedom of information

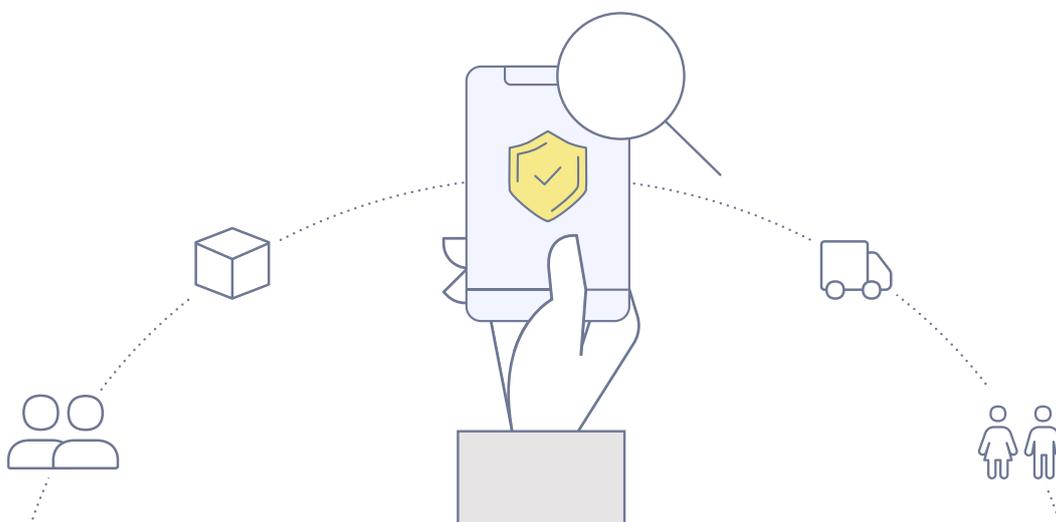
As a company, we democratise access to and the use of digital networks and technologies and facilitate the provision of information, education and resources. Everyone should have

the opportunity to freely express their opinions and engage in a respectful manner with one another. We are politically neutral in our actions and are neither directly nor indirectly for or against any political party. We promote the **right to freedom of expression** within the regulatory parameters by which we are bound.

Similar to the right to freedom of expression, the **right to freedom of information** forms the basis of open and democratic societies. Aware of this outstanding importance, we enable and encourage the exchange of information via our public communications networks. Based on the principle of net neutrality, we are committed to not restricting access to information and the right to information for third parties and are obliged to transport all data traffic unhindered. Exceptions to this, such as blocking or restricting information, are subject to strict legal requirements (e.g. the EU regulation on net neutrality). As an internet access provider, we may or will only block access to information via our public communications networks if the relevant regulatory requirements are met.

For example, as a voluntary member of the Clearing Body for Copyright on the Internet (CUII), we adhere to its recommendations for imposing Domain Name System (DNS) blocking. Drawing on objective criteria, the CUII examines whether the legal requirements for blocking a website due to structural and clear copyright infringements are met. In cases in which the CUII recommends blocking a DNS, the recommendation is also subject to a review by the Bundesnetzagentur (German Federal Network Agency for Electricity, Gas, Telecommunications, Post and Railways) regarding its compatibility with the requirements of net neutrality.

More information on freedom of expression and freedom of information can be found in the [Guideline for Ethically Responsible Communication](#) ↗.



## Child and youth protection rights in the digital space

We feel we have a special obligation towards children and young people and therefore commit to UNICEF's Children's Rights and Business Principles. Compliance with the legal requirements in particular for media protection for minors in Germany and the EU and our social responsibility towards children and young people are our top priorities. We ensure that the needs of young mobile communications and Internet users are considered and that our products, services and tariffs are in accordance with the statutory youth protection requirements.

Our communication does not interfere with the individual rights of children (honour, data protection, privacy and self-image). We ensure that it does not have any negative impacts on children's rights. We help to protect children and young people from content and communication which could cause them physical, moral or psychological harm.

More information on this can be found in the [Guideline for Ethically Responsible Communication](#) and in our [Commitment to Children's Rights](#).

## Combating and preventing corruption

We respect honesty and integrity and operate in accordance with the applicable laws as well as our internal rules regarding ethical and responsible management. We do not accept any form of corruption, extortion or bribery (zero tolerance).

To combat corruption in its various forms, we have established a control environment featuring elements such as internal rules and anti-corruption processes, and we continuously train our employees. More information on this can be found in the [Guideline on Anti-Corruption](#).

We expect our suppliers and business partners to take active and consistent action against any type of criminal or unethical influence by companies or institutions, as well as against corruption in their own company. Our expectations regarding combating and preventing corruption in the supply chain are formulated in the [Supply Chain Sustainability Policy](#).

## The rights of local communities

We respect the rights of local communities which may be affected by the business activities of Telefónica Deutschland or our suppliers and business partners.

At our business locations, we pay attention to health, safety and environmental protection for our employees and the neighbourhood. In particular, we pay attention to observing the limits set for electromagnetic radiation as well as air, water and soil pollution, and investigate noise complaints. We also take a responsible and sustainable approach to deforestation and waste management.

We promote the expansion of our telecommunications network in rural regions to enable everyone to access and use digital networks and technologies. We aim to develop the network infrastructure on the back of consensus with local communities and municipalities. To this end, we engage in dialogue with them and take into account their concerns as well as the technical, legal, environmental and economic parameters.

## Minerals from conflict-affected and high-risk areas

The manufacturing of products that we distribute as part of our business activities can pose risks to people along the supply chains. This includes, for example, minerals used in smartphones which are sourced from risk areas.

As a telecommunications company that does not manufacture its own goods, we are in close dialogue with business partners and suppliers. We have therefore established processes to identify and mitigate human rights and environment-related risks in the supply chain. The expectations we have of our business partners and suppliers in relation to responsible sourcing of minerals are formulated in the [Supply Chain Sustainability Policy](#).

These include compliance with the Minamata Convention on Mercury, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and the Stockholm Convention on Persistent Organic Pollutants.

# Implementation of human rights and environmental due diligence

The implementation of human rights and environment-related due diligence processes is based on the aforementioned national and international standards and frameworks. In particular, they are aligned with the requirements of the LkSG and the UN Guiding Principles on Business and Human Rights as well as the OECD Guidelines for Multinational Enterprises.

We consider human rights a cross-cutting issue within our company and therefore emphasise effective and structured collaboration with various departments. The cross-departmental Human Rights Committee, composed of the Human Rights Officer, executives, coordinators and experts, supports the collaboration between departments and leads investigations falling within the remit of the complaints procedure.

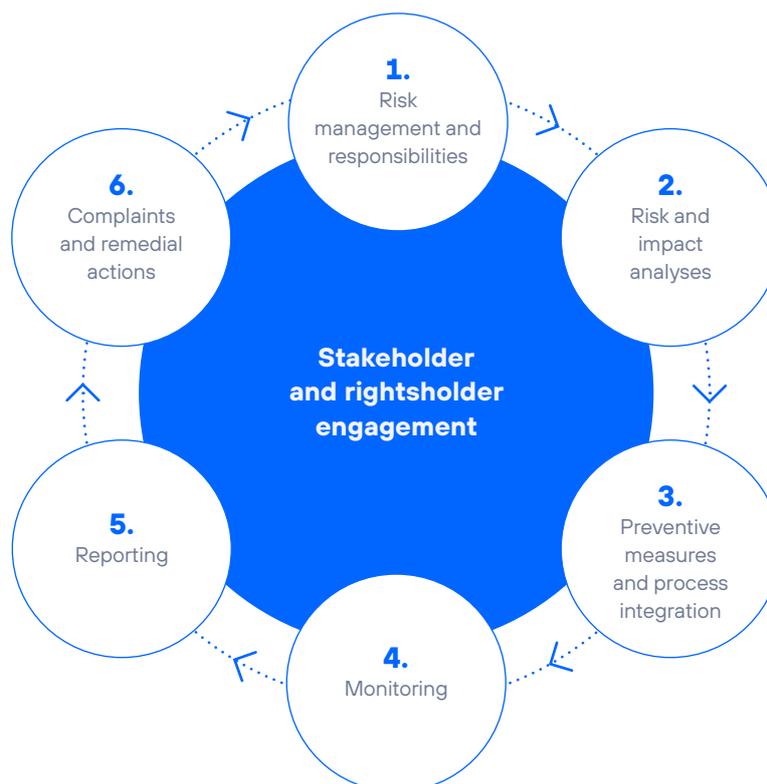
## Risk management and responsibilities

The Management Board of Telefónica Deutschland is responsible for monitoring compliance with and implementation of our human rights and environment-related due diligence obligations ("due diligence obligations"). The appointed Human Rights Officer monitors the implementation of the due diligence processes in and engages on an ongoing basis with the Management Board.

The experts in the Corporate Responsibility & Sustainability directorate are involved in identifying due diligence obligations. Further, they are responsible for coordinating the implementation of the human rights and environment-related due diligence processes. They develop methodological approaches and perform quality assurance.

The Management Board is informed at least once a year about the work of the Human Rights Officer and the progress made in implementing the risk management and due diligence processes. The due diligence processes' effectiveness is reviewed regularly.

### Due diligence process for human rights



## Risk and impact analyses

Regular risk and impact assessments help us understand the risks and impacts that our business activities and relations as well as our products and services have on people and the environment. We therefore perform annual analyses for our own operations and our direct suppliers as part of our risk management process. We also conduct ad hoc assessments where necessary.

The first step involves identifying our risks based on an **abstract analysis**. We use, for example, country, site, product and service information to develop a comprehensive risk profile.

The second step is to determine our **concrete risks** based on internal information and indicators, supplier-specific information and dialogue with the relevant areas, suppliers and business partners. To identify risks in the supply chain, we additionally use an AI-based supplier monitoring tool and an external supplier assessment platform. Where necessary, we conduct ad hoc risk-based reviews and audits of our suppliers to gain additional information about potential risks or violations.

In the subsequent **risk assessment and prioritisation**, it is important to us that the risks are evaluated from the perspective of those affected and are prioritised according to appropriate criteria. To do this, we determine the severity (scale of negative impact, scope of people affected/size of the environmental areas affected, irreversibility) and likelihood of occurrence of risks. We also assess our contribution to causing risks and our ability to influence remediation or avoidance of the risks, in order to select appropriate and effective measures. In the implementation of preventive measures and remedial actions, we follow a **risk-based approach**.

As part of the risk analysis for 2025, Telefónica Deutschland has not identified any priority risks in its own operations. However, we have identified two risks that we address regardless.

- We actively work on mitigating the risk of unequal treatment in the workplace.
- We maintain a high health and safety standard to manage risks of accidents in network deployment, particularly with a focus on technicians conducting work in heights or underground.

The following priority risks were identified for our direct supply chain:

- Inadequate wages
- Unequal treatment in employment
- Disregarding freedom of association and the right to collective bargaining
- Disregarding occupational safety and health obligations.

The risks were particularly identified in our global supply chains. We communicate our human rights-related expectations regarding these risks through our Supplier Code of Conduct, the [Supply Chain Sustainability Policy](#) . To address these risks, we implement appropriate preventive measures and collaborate closely with our suppliers. We provide a LkSG training to our suppliers to further raise awareness. The performance of our suppliers is regularly monitored using digital tools, and in case of irregularities, we work together with them to initiate corrective actions. Additionally, we promote supply chain sustainability as part of the Joint Alliance for CSR (JAC) sector initiative, together with other companies.

## Preventive measures and process integration

In order to prevent risks and violations, we integrate the results of the risk analysis into company processes. We also take appropriate preventive measures in our own operations and together with our suppliers and business partners. We not only adapt and improve existing measures, but also develop new approaches.

Our most important preventive measures include:

- **Guidelines and documentation for the due diligence processes:** an overview of the relevant guidelines can be found at the beginning of this Declaration of Principles (see "Our commitment to respecting human rights"). These guidelines are embedded in the relevant departments and processes.

We have developed a manual on our human rights strategy for employees. It documents the implementation of the human rights and environment-related due diligence processes.

- **Sustainable purchasing practices and the Supply Chain Sustainability Policy:** in order to protect people and the environment in our global supply chains, we are committed to sustainable procurement practices and supplier management.

The [Supply Chain Sustainability Policy](#) serves as an important foundation. It formulates our expectations towards suppliers and business partners and forms the basis for our cooperation in implementing due diligences processes in the supply chain. Following a risk-based approach, we gather sustainability data from our suppliers via a cloud-based platform, which we then analyse.

- **Capacity building and training:** we use training to communicate our approach to protecting and respecting human rights as well as the requirements of the LkSG to specific departments, the management and our suppliers. Training is made available to all employees and direct suppliers.

There are also topic-specific training courses that all Telefónica Deutschland employees are required to complete regularly. These include training regarding occupational health and safety, the General Act on Equal Treatment (AGG), energy and environmental management, data protection, information security and the Responsible Business Principles.

- **Risk-based controls and on-site assessments:** we assess high-risk suppliers as part of targeted audits and control measures. They include on-site assessments and improvement plans, which are jointly agreed on with suppliers. The implementation of the corrective measures is documented and tracked. In doing so, we cooperate with other companies in the sector initiative JAC.

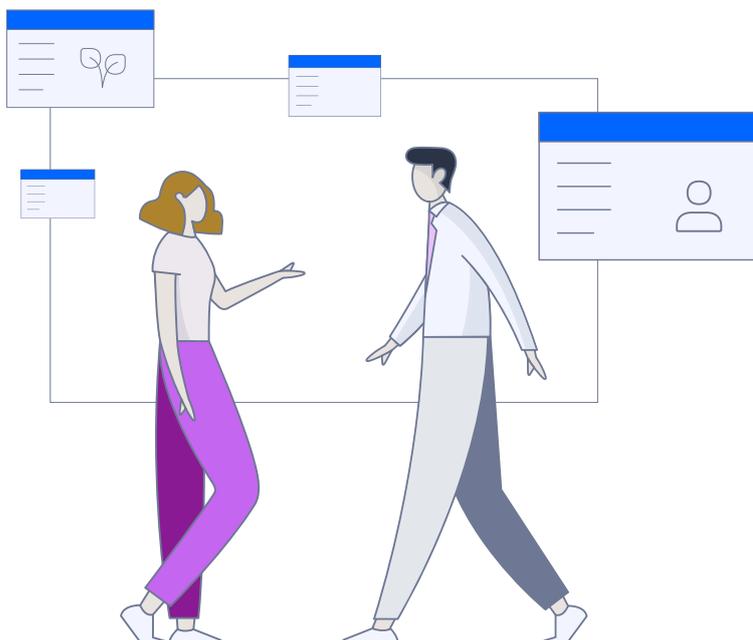
## Monitoring

We review the effectiveness of our risk management and our human rights and environment-related due diligence processes at least annually as well as on an ad hoc basis. We pay particular attention to assessing the effectiveness of the preventive measures, remedial actions and the complaints procedure.

We use regular checks to assess whether our implementation is effective in terms of preventing or eliminating human rights and environment-related risks. We measure the progress made in our due diligence processes using suitable indicators. A Three Lines of Defence model ensures the independent review while facilitating the continuous further improvement of our risk management.

## Reporting

We report on the progress made with implementing our human rights and environment-related risk management system and our due diligence processes due diligence processes on our [sustainability website](#).



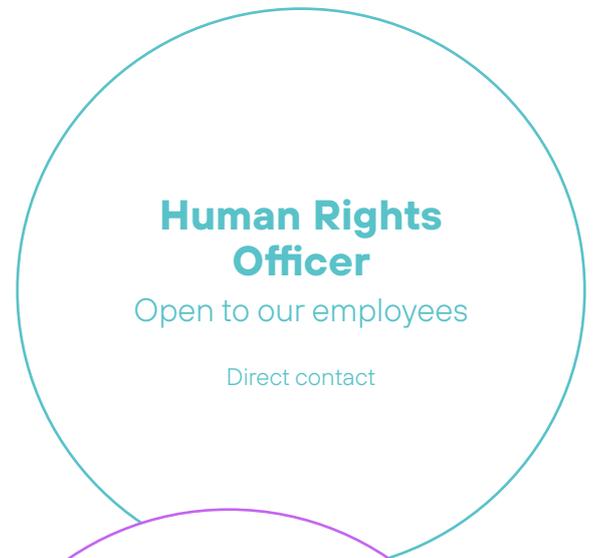
## Complaints procedure and remedial actions

### Complaints procedure

We have set up a [complaints procedure](#) to offer our employees, suppliers, business partners, stakeholders, customers and other potentially affected parties the opportunity to report and prevent risks posed to or violations of human rights and the protection of the environment. The procedure allows everyone who is potentially affected to bring any risks or violations in our lines of business or along our supply chains to our attention.

The reporting person may speak for themselves or on behalf of other potentially affected people. Reports and complaints can be submitted in 21 languages.

Our complaints procedure consists of three reporting channels.



All reports are treated confidentially and may also be submitted anonymously via the ombudsperson. We take all complaints seriously and investigate them carefully. A key concern for us is that we protect reporting persons from reprisals. For this purpose, all persons who are commissioned with the handling of complaints are contractually bound to secrecy and impartiality and are not bound by instructions. Personal information is never passed on to third parties.

While complaints are processed, we notify the reporting person about the processing status and progress. If a complaint indicates an actual risk or actual violation, the expectations of those affected are taken into account in the development of measures.

We consider complaints an opportunity to continuously improve our risk management system and our due diligence processes. We also review the effectiveness of the complaints procedure annually and on an ad hoc basis.

Detailed information about our complaints procedure and the rules of procedure can be found on our [company website](#) ↗.

## Remedial actions

In the event that human rights or environment-related violations occur, we have developed a remediation concept in order to immediately implement appropriate and suitable measures. We differentiate here between violations in our own operations and in the supply chain.

In our own operations, we take immediate measures to end violations. For violations that occur in the supply chain, we work with our suppliers and business partners and use our ability to influence to end the violations. If we fail to see any improvement after a specified time has passed, we reserve the right to suspend or terminate the business relations as a last resort. If this is the case, we endeavour to end the business relationship responsibly in a manner that mitigates the consequences for potentially affected stakeholders.

We are aware that we have only limited influence in complex supply chains and cannot solve systemic problems on our own. We are therefore involved in international multi-stakeholder initiatives for transparency and sustainability in supply chains, including the Public-Private Alliance for Responsible Minerals Trade (PPA), the Responsible Minerals Initiative (RMI) and the Joint Alliance for CSR (JAC), through the memberships of Telefónica S.A.

## Consideration of stakeholders and potentially affected parties

In the implementation of the outlined due diligence processes, we consider the perspective of potentially affected parties and particularly vulnerable groups on a continuous basis. It is important to us that the perspective and expectations of those affected are taken into account in the assessment of risks and violations, in the development of preventive measures and remedial actions, and in the processing of complaints.

# Conclusion and adoption by the Management Board

We consider the implementation of our human rights and environment-related risk management system and our due diligence processes to be an ongoing task. In doing so, we aim to continuously develop and improve our actions, processes and systems. We will regularly review this Declaration of Principles and update it as necessary.

19 November 2025



**Markus Haas**  
Chief Executive Officer  
Chairman of the Board of Directors of Telefónica Deutschland Holding AG  
Member of the Executive Committee of Telefónica S.A.



**Markus Rolle**  
Chief Financial Officer  
Member of the Board of Directors of Telefónica Deutschland Holding AG



**Valentina Daiber**  
Chief Officer Legal & Corporate Affairs  
Member of the Board of Directors of Telefónica Deutschland Holding AG



**Nicole Gerhardt**  
Chief Organizational Development & People Officer  
Member of the Board of Directors of Telefónica Deutschland Holding AG



**Andreas Laukenmann**  
Chief Consumer Officer  
Member of the Board of Directors of Telefónica Deutschland Holding AG



**Alfons Lösing**  
Chief Partner & Wholesale Officer  
Member of the Board of Directors of Telefónica Deutschland Holding AG



**Mallik Rao**  
Chief Technology & Information Officer  
Member of the Board of Directors of Telefónica Deutschland Holding AG

